

# FairLaw Firm

**FairLaw Firm**

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To:  
Hernando Quintero

**INVOICE**
**Open (Not Sent)**
**Invoice # 705**
**Invoice Date:** 5/1/2025

**Due Date:** 5/16/2025

Amount due  
**37,321.35**

**Services**

Date	Staff Member	Category	Description	Duration	Total
8/15/2024	Brian H. Pollock Esq.	Draft/revise	Draft letter to Mr. Quintero advising him to preserve evidence and the consequences of not doing so	0.20	100.00
8/15/2024	Steffany Sanguino	Paralegal	I met in person with Mr. Quintero to review the records he has and went over [REDACTED]	1.20	198.00
8/15/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	In-person conference with Mr. Quintero (and Ms. Parra) to discuss their claims and what to expect; review sign-up procedures, and obtain facts from them	1.70	850.00
8/16/2024	Steffany Sanguino	Paralegal	Received, reviewed, and organized the documents from Mr. Quintero.	0.40	66.00
8/16/2024	Brian H. Pollock Esq.	Draft/revise	Draft letter to Ms. Parra advising her to preserve evidence and the consequences of not doing so	0.20	100.00
8/19/2024	Steffany Sanguino	Paralegal	I provided client Quintero with an update via email.	0.20	33.00
8/20/2024	Steffany Sanguino	Paralegal	An email exchange with the client, Quintero, gave him an update.	0.20	33.00
8/20/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Review file and draft Complaint to include claims for unpaid MW and tips under the FLSA, one count for each claim, and separate Counts for each client (2), for a total of 4 counts	1.70	850.00
8/20/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of BHP's intake notes and the materials in the file as provided by the client(s) in preparation for handling the case and drafting FMWA demand letters	0.20	65.00
8/21/2024	Steffany Sanguino	Paralegal	Draft the summonses (x2) and the Civil Coversheet for filing and conduct online research for the Summonses	0.30	49.50
8/21/2024	Brian H. Pollock Esq.	Draft/revise	Draft Letter to Quintero updating him on the status - that his case was filed in federal court (in English and in Spanish), the District Judge and Magistrate Judges assigned, and what to expect going forward	0.40	200.00
8/21/2024	Brian H. Pollock Esq.	Draft/revise	Draft Letter to Ms. Parra updating her on the status - that her case was filed in federal court (in English and in Spanish), the District Judge and Magistrate Judges assigned, and what to expect going forward	0.40	200.00

8/22/2024	Steffany Sanguino	Paralegal	Receipt of the Summonses (x2) issued by the Clerk of Courts; then, draft email to process server enclosing Summonses, Complaint, and providing instructions for service	0.40	66.00
8/22/2024	Brooks LaRou Esq.	Draft/revise	Draft Notice of Appearance as Counsel for Plaintiffs.	0.20	65.00
8/22/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of Complaint.	0.30	97.50
8/22/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of summonses (x2) issued as to Cantina Catrina and Juan Carlos Cachoua.	0.20	65.00
8/22/2024	Steffany Sanguino	Paralegal	The client, Hernando Quintero, confirmed he provided us with all the documents he has.	0.20	33.00
8/22/2024	Steffany Sanguino	Paralegal	Received confirmation from the process server for Job numbers, 2024001216 and 2024001217 for service of the Summons and Complaint	0.10	16.50
8/22/2024	Steffany Sanguino	Paralegal	Conversation with client Quintero, regarding the complaint he received via email.	0.30	49.50
8/22/2024	Brooks LaRou Esq.	Unassigned	Meeting with Hernando Quintero and Maria Hidalgo regarding factual allegations of claims, case strategy, and adding additional Plaintiffs to lawsuit; revisions to meeting notes.	1.80	585.00
8/23/2024	Brooks LaRou Esq.	Unassigned	Meeting with additional plaintiff Kelvid Villegas regarding assessment of claims and case strategy.	1.20	390.00
8/23/2024	Brooks LaRou Esq.	Draft/revise	Drafted FMWA pre-suit demand letters for Hernando Quintero, Alejandra Gabriela Parra, and Kelvid Villegas.	1.50	487.50
8/23/2024	Steffany Sanguino	Paralegal	The client, Quintero, informed me he [REDACTED].	0.20	33.00
8/23/2024	Brooks LaRou Esq.	Phone Call	Phone call with Hernando Quintero regarding estimation of damages and sending FMWA pre-suit demand letters.	0.40	130.00
8/23/2024	Steffany Sanguino	Paralegal	I translated a phone call with Hernando Quintero and Mr. LaRou to discuss our estimation of his damages, how we arrived at same, and the sending a FMWA pre-suit demand letter.	0.40	66.00
8/23/2024	Steffany Sanguino	Paralegal	I translated a phone call with Alejandra Parra and Mr. LaRou to discuss our estimation of her damages and the sending a FMWA pre-suit demand letter.	0.30	49.50
8/23/2024	Steffany Sanguino	Paralegal	Received email update from process server update: 8/23/2024 8:40 am Attempted service at 1425 Brickell Ave 41F, Miami, FL 33131. This is an apartment. No answer and no movement; respond re: same	0.10	16.50
8/23/2024	Brooks LaRou Esq.	Unassigned	Meeting with additional plaintiffs, Alena Olazabal and Elis Moreno, regarding assessment of claims and case strategy; revisions to meeting notes.	1.20	390.00
8/23/2024	Steffany Sanguino	Paralegal	Reciept of Return of Service on Catrina Dadeland	0.10	16.50

8/23/2024	Brooks LaRou Esq.	FLSA - Plaintiff	Analyze the time record data for Hernando Quintero, Alejandra Parra, and Kelvid Villegas, prepare Excel spreadsheet for this to determine potential case/claim value and amounts owed to each Plaintiff	0.80	260.00
8/23/2024	Brooks LaRou Esq.	Draft/revise	Draft and revise the FMWA pre-suit demand letter for Hernando Quintero.	0.30	97.50
8/23/2024	Brooks LaRou Esq.	Draft/revise	Draft and revise the FMWA pre-suit demand letter for Alejandra Parra.	0.30	97.50
8/23/2024	Brooks LaRou Esq.	Draft/revise	Draft and revise the FMWA pre-suit demand letter for Kelvid Villegas.	0.30	97.50
8/26/2024	Brian H. Pollock Esq.	Draft/revise	Draft NOF Return of Service on Catrina Dadeland	0.30	150.00
8/26/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Return of Service for Cantina Catrina.	0.10	32.50
8/26/2024	Steffany Sanguino	Paralegal	I emailed the client, Quintero, requesting his witnesses.	0.10	16.50
8/26/2024	Steffany Sanguino	Paralegal	I emailed Steve to f.u with service on Juan Cachoua	0.20	33.00
8/26/2024	Brian H. Pollock Esq.	Draft/revise	Revise FMWA demand letter for Mr. Quintero and others similarly situated	0.30	150.00
8/26/2024	Steffany Sanguino	Paralegal	Request additional information from Alena Olazabal	0.10	16.50
8/26/2024	Steffany Sanguino	Paralegal	Conversation with the client, Quintero, regarding his witnesses.	0.20	33.00
8/26/2024	Brooks LaRou Esq.	Unassigned	Analyze time entries and create Excel spreadsheet for use in calculating amounts owed to clients: Maria Hidalgo, Elis Moreno, and Alena Olazabal.	0.70	227.50
8/26/2024	Brooks LaRou Esq.	Draft/revise	Drafted FMWA pre-suit demand letter for Maria Hidalgo.	0.30	97.50
8/26/2024	Brooks LaRou Esq.	Draft/revise	Drafted FMWA pre-suit demand letter for Elis Moreno.	0.30	97.50
8/26/2024	Brooks LaRou Esq.	Draft/revise	Drafted FMWA pre-suit demand letter for Alena Olazabal.	0.30	97.50
8/26/2024	Brooks LaRou Esq.	Draft/revise	Revisions to FMWA pre-suit demand letters for Hernando Quintero, Alejandra Parra, and Kelvin Villegas.	0.20	65.00
8/26/2024	Steffany Sanguino	Paralegal	The first draft of the Rule 26 disclosure has been completed for attorney review	0.50	82.50
8/26/2024	Steffany Sanguino	Paralegal	I emailed the client, Quintero, requesting all the payroll.	0.20	33.00
8/26/2024	Steffany Sanguino	Paralegal	Requested additional information from Maria Hidalgo	0.10	16.50

8/26/2024	Steffany Sanguino	Paralegal	I emailed the client Maria Hidalgo requesting documents to help her with her case.	0.20	33.00
8/26/2024	Steffany Sanguino	Paralegal	Receive, review, and then organize and analyze the additional information and materials from Alena Olazabal.	0.10	16.50
8/26/2024	Steffany Sanguino	Paralegal	I emailed Alena Olazabal requesting the documents.	0.20	33.00
8/26/2024	Steffany Sanguino	Draft/revise	Draft letter to Alena Olazabal re: the need to preserve relevant evidence and what can happen for not doing so	0.30	49.50
8/26/2024	Brian H. Pollock Esq.	Draft/revise	Draft ltr to Maria Hidalgo re: the need to preserve relevant evidence and what can happen for not doing so	0.30	150.00
8/26/2024	Brian H. Pollock Esq.	Draft/revise	Draft letter to Alejandra Gabriela Parra re: the need to preserve relevant evidence and what can happen for not doing so	0.30	150.00
8/26/2024	Brian H. Pollock Esq.	Draft/revise	Draft ltr to Kelvid Villegas re: the need to preserve relevant evidence and what can happen for not doing so	0.30	150.00
8/26/2024	Steffany Sanguino	Paralegal	I emailed client Kelvid Villegas requesting his documents.	0.20	33.00
8/26/2024	Brooks LaRou Esq.	Draft/revise	Revisions to FMWA pre-suit demand letters for Hernando Quintero, Alejandra Parra, Kelvid Villegas, Maria Hidalgo, Elis Moreno, and Alena Olazabal.	1.00	325.00
8/27/2024	Brooks LaRou Esq.	Phone Call	Phone call with Maria Hidalgo regarding estimation of unpaid work hours.	0.20	65.00
8/27/2024	Brooks LaRou Esq.	Phone Call	Phone call with Kelvid Villegas regarding estimation of unpaid work hours.	0.20	65.00
8/27/2024	Steffany Sanguino	Paralegal	I translated a call between the client, Maria Hidalgo and Brooks, regarding the estimation of unpaid work hours.	0.20	33.00
8/27/2024	Steffany Sanguino	Paralegal	I translated a call between the client, Kelvid Villegas and Brooks, regarding the estimation of unpaid work hours.	0.20	33.00
8/27/2024	Brooks LaRou Esq.	Draft/revise	Final revisions to drafts of FMWA pre-suit demand letters for Maria Hidalgo, Kelvin Villegas, Elis Moreno, and Alena Olazabal.	0.40	130.00
8/27/2024	Brooks LaRou Esq.	Unassigned	Conferral with Hillary Frontado regarding mailing FMWA pre-suit demand letters and scanning/saving copies of the same.	0.20	65.00
8/28/2024	Brooks LaRou Esq.	Unassigned	Meeting with Ana Mendoza regarding assessment of claims and joining pending lawsuit against Cantina Catrina and Juan Carlos Cachoua; revisions to meeting notes.	0.80	260.00
8/28/2024	Brooks LaRou Esq.	Unassigned	Input time entry data for Ana Mendoza into Excel spreadsheet of damages; calculation of wages owed.	0.40	130.00
8/28/2024	Steffany Sanguino	Paralegal	Update from the process server: Attempted service at 1425 Brickell Ave 41F, Miami, FL 33131. This is an apartment. No answer and no movement.	0.10	16.50
8/28/2024	Steffany Sanguino	Paralegal	Review, organize, and analyze Mr. Quintero's Earning statements from 2023.	0.40	66.00
8/28/2024	Steffany	Paralegal	Review, organize, and analyze Alejandra Parra's Earning	0.40	66.00

	Sanguino		statements from 2023 - 2024.		
8/28/2024	Brooks LaRou Esq.	Draft/revise	Drafted FMWA pre-suit demand letter for Ana Mendoza.	0.30	97.50
8/28/2024	Brooks LaRou Esq.	Unassigned	Conferral with Hillary Frontado regarding mailing FMWA pre-suit demand letter for Ana Mendoza.	0.10	32.50
8/28/2024	Steffany Sanguino	Paralegal	Review, organize, and analyze Maria Hidalgo's Earning statements from 2023 - 2024	0.30	49.50
8/28/2024	Steffany Sanguino	Paralegal	Review, organize, and analyze Kelvid Villegas's Earning statements from 2023 - 2024	0.30	49.50
8/28/2024	Steffany Sanguino	Paralegal	Review, organize, and analyze Elise Moreno's Earning statements from 2024	0.30	49.50
8/28/2024	Steffany Sanguino	Paralegal	Review, organize, and analyze Alena Olazabal's Earning statements from 2023 - 2024	0.30	49.50
8/28/2024	Steffany Sanguino	Paralegal	Review, organize, and analyze checks paid to Betania Maria Vargas De Lopez	0.10	16.50
8/28/2024	Brooks LaRou Esq.	Unassigned	Conferral with Hillary Frontado regarding Hernando Quintero's questions regarding FMWA pre-suit demand letters.	0.10	32.50
8/28/2024	Brooks LaRou Esq.	Unassigned	Conferral with Reyna Guerra regarding Ana Mendoza's questions regarding her FMWA pre-suit demand letter.	0.10	32.50
8/28/2024	Steffany Sanguino	Paralegal	The client, Quintero, called with questions regarding the demand letter we sent.	0.10	16.50
8/28/2024	Steffany Sanguino	Paralegal	After conferring with Mr. LaRou, I called the client back and discussed the demand letter we sent out and that each person's case/claim will be handled according to their individual wages and personalized conditions.	0.30	49.50
8/28/2024	Brian H. Pollock Esq.	Draft/revise	Draft Letter to Ana Mendoza re: the need to preserve relevant evidence and what can happen for not doing so	0.30	150.00
8/29/2024	Brooks LaRou Esq.	Unassigned	Meeting with Betania Vargas regarding assessment of claims and joining pending lawsuit against Cantina Catrina and Juan Carlos Cachoua; revisions to meeting notes.	0.80	260.00
8/29/2024	Brooks LaRou Esq.	Unassigned	Input time entry data for Ana Mendoza into Excel spreadsheet of damages; calculation of wages owed.	0.40	130.00
8/29/2024	Brooks LaRou Esq.	Draft/revise	Drafted FMWA pre-suit demand letter for Betania Vargas.	0.30	97.50
8/29/2024	Brooks LaRou Esq.	Unassigned	Conferral with Hillary Frontado regarding mailing FMWA pre-suit demand letter for Betania Vargas.	0.10	32.50
8/30/2024	Steffany Sanguino	Paralegal	Requested additional information from Hidalgo	0.10	16.50
8/30/2024	Steffany Sanguino	Paralegal	Requested additional information from Mendoza	0.20	33.00
8/30/2024	Steffany Sanguino	Paralegal	Requested additional information from Parra.	0.20	33.00



8/30/2024	Steffany Sanguino	Paralegal	Received, review, organize and analyze Villegas's additional information.	0.10	16.50
9/3/2024	Steffany Sanguino	Paralegal	Request (again) additional information from Maria Hidalgo.	0.10	16.50
9/3/2024	Steffany Sanguino	Paralegal	Receive, review, organize, and analyze additional information from Maria Hidalgo.	0.10	16.50
9/5/2024	Steffany Sanguino	Paralegal	An update from the process server regarding service for Juan Carlos Cachoua has been received. They have been trying to serve the defendant to 1425 Brickell Ave 41F, Miami, FL 33131. But no one answers. I emailed the client to see if he has a different address we can use.	0.30	49.50
9/5/2024	Steffany Sanguino	Paralegal	Conversation with the client regarding a new phone number or a new address to serve defendant Juan Carlos Cachoua.	0.20	33.00
9/5/2024	Steffany Sanguino	Paralegal	I emailed the process server to provide the following: Eliana Solis (accountant): 305-713-5577 The building is called The Mint located at 92 SW 3rd St, Miami, FL 33130. Juan Carlos Cachoua: 786-564-3339	0.20	33.00
9/5/2024	Steffany Sanguino	Paralegal	Receive, review, organize, and analyze additional information from client Parra.	0.10	16.50
9/6/2024	Brian H. Pollock Esq.	Draft/revise	Draft letter to Ms. Vargas re: the need to preserve relevant evidence and what can happen for not doing so	0.30	150.00
9/6/2024	Brian H. Pollock Esq.	Draft/revise	Draft Letter to Elis Moreno re: the need to preserve relevant evidence and what can happen for not doing so	0.30	150.00
9/6/2024	Steffany Sanguino	Paralegal	The client, Quintero, called to inform us that he found out that payments are being made to people who are not part of the lawsuit. He wants to know what he should do about it, ad the other parties involved in the lawsuit are asking why the are not receiving their payments. Conferral with Brooks about it to better advise the client.	0.10	16.50
9/9/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange emails with Mr. Narulo re: his representation of Defendants, his request for a 2-week extension of time to respond to the Complaint, and representation, as well as my response to same,	0.30	150.00
9/9/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange emails with Mr. Narula re: his introduction, representation of Defendant, and my looking forward to working with him in this case	0.20	100.00
9/10/2024	Steffany Sanguino	Service of Process	Receipt and Return of Non-service for Juan Carlos Cachoua.	0.29	47.85
9/10/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt of voicemail from counsel for Defendants (Anthony Narula).	0.10	32.50
9/10/2024	Brooks LaRou Esq.	Email Communication	Emails to/from counsel for Defendants (Anthony Narula) regarding Defendants request for two-week extension to respond to Complaint, and setting call to discuss claims.	0.20	65.00
9/10/2024	Brian H. Pollock Esq.	Teleconference with	T/c with Mr. Narula, counsel for Defendants, to discuss the case, the claims, and potential for resolution	0.50	250.00
9/11/2024	Brooks LaRou	Receipt, Review, and	Receipt and review of Defendants' Motion for Extension to Respond to Complaint and Proposed Order granting the	0.10	32.50

	Esq.	Analysis	same.		
9/11/2024	Steffany Sanguino	Paralegal	Receive, review, organize, and analyze additional information from Betania Vargas.	0.10	16.50
9/11/2024	Steffany Sanguino	Paralegal	Receipt and review of additional information from Elise Moreno	0.10	16.50
9/11/2024	Steffany Sanguino	Paralegal	Draft and revise the (5) Consents to Join for Maria Hidalgo, Elis Moreno, Ana Mendoza, Alejandra Parra, Kelvid Villegas, and Hernando Quintero related to their pursuit of the FLSA claims in this case	1.10	181.50
9/11/2024	Steffany Sanguino	Paralegal	I called the client, Quintero, to discuss the consent we sent him. The client confirmed he would review and sign it.	0.10	16.50
9/11/2024	Steffany Sanguino	Paralegal	I called the client, Hidalgo, to discuss the consent we sent her. The client confirmed she would review and sign it.	0.10	16.50
9/11/2024	Steffany Sanguino	Paralegal	I called the client, Moreno, to discuss the consent we sent her. The client confirmed she would review and sign it.	0.10	16.50
9/11/2024	Steffany Sanguino	Paralegal	I called the client, Mendoza, to discuss the consent we sent her	0.10	16.50
9/11/2024	Steffany Sanguino	Paralegal	I called the client, Parra, to discuss the consent we sent her. The client confirmed she would review and sign it.	0.10	16.50
9/11/2024	Steffany Sanguino	Paralegal	I called the client, Villegas, to discuss the consent we sent him. The client confirmed he would review and sign it.	0.10	16.50
9/12/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order granting Defendants' Motion for Extension to file Response to Complaint.	0.10	32.50
9/12/2024	Brooks LaRou Esq.	Unassigned	Conferral with Hillary Frontado regarding setting call with client to discuss case status.	0.10	32.50
9/12/2024	Steffany Sanguino	Paralegal	Client Ana Mendoza called to confirm she received payment from the defendant, and [REDACTED] conferral with Brooks about it.	0.30	49.50
9/12/2024	Steffany Sanguino	Paralegal	Receipt and review of Mr. Quintero's consent signed to join and let Mr. LaRou know so he can draft a Notice of Filing for it	0.10	16.50
9/12/2024	Steffany Sanguino	Paralegal	Receipt and review of Maria Hidalgo's signed consent to join and let Mr. LaRou know so he can draft a Notice of Filing for it	0.10	16.50
9/12/2024	Steffany Sanguino	Paralegal	Receipt and review of Elis Moreno's signed consent to join and let Mr. LaRou know so he can draft a Notice of Filing for it	0.10	16.50
9/12/2024	Steffany Sanguino	Paralegal	I contacted the client to discuss his call with attorney Mr. LaRou.	0.20	33.00
9/13/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Judge Becerra's Order Regarding Procedures.	0.20	65.00
9/13/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding case status, employees' receipt of paychecks, and intent to pursue claims for liquidated damages and unpaid tips/overtime wages.	0.50	162.50
9/13/2024	Brooks LaRou Esq.	Phone Call	Phone call with Ana Mendoza regarding her receipt of payment and her intent not to join lawsuit.	0.20	65.00

9/13/2024	Steffany Sanguino	Paralegal	Called client Elis Moreno to discuss the consent to join the lawsuit	0.20	33.00
9/13/2024	Steffany Sanguino	Paralegal	Receipt and review of Elis Moreno's signed consent to join and let Mr. LaRou know so he can draft a Notice of Filing for it	0.10	16.50
9/13/2024	Steffany Sanguino	Paralegal	Called client Alena Olazabal to discuss the consent to join the lawsuit	0.20	33.00
9/13/2024	Steffany Sanguino	Paralegal	Receipt and review of Alena Olazabal consent to join and let Mr. LaRou know so he can draft a Notice of Filing for it	0.10	16.50
9/13/2024	Steffany Sanguino	Paralegal	Called Bentania Vargas to discuss the consent to join the lawsuit	0.20	33.00
9/13/2024	Steffany Sanguino	Paralegal	Receipt and review of Bentania Vargas's signed consent to join and let Mr. LaRou know so he can draft a Notice of Filing for it	0.10	16.50
9/13/2024	Steffany Sanguino	Paralegal	Called client Kelvid Villegas to discuss the consent to join the lawsuit	0.20	33.00
9/13/2024	Steffany Sanguino	Paralegal	Receipt and review of Kelvid Villegas's signed consent to join and let Mr. LaRou know so he can draft a Notice of Filing for it	0.10	16.50
9/13/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft Notice of Filing Consent to Join for Alena Olazabal and review of her signed consent for same	0.20	100.00
9/13/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft Notice of Filing Consent to Join for Betania Vargas and review of her signed consent for same	0.20	100.00
9/13/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft Notice of Filing Consent to Join for Elias Moreno and review of her signed consent for same	0.20	100.00
9/13/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft Notice of Filing Consent to Join for Maria Hidalgo and review of her signed consent for same	0.20	100.00
9/15/2024	Brian H. Pollock Esq.	Draft/revise	Create spreadsheet summarizing the amounts owed to each client to facilitate negotiations and evaluation of case	1.00	500.00
9/18/2024	Steffany Sanguino	Paralegal	Conferral with Brooks regarding service for defendant Juan Carlos Cachoua since we could not serve him. Since OC filed a MET naming both defendants, we should be ok.	0.10	16.50
9/18/2024	Steffany Sanguino	Paralegal	Updated the Rule 26t disclosures.	0.20	33.00
9/18/2024	Steffany Sanguino	Paralegal	The first draft of the Certificate of Interested Parties has been completed.	0.50	82.50
9/18/2024	Steffany Sanguino	Paralegal	Client Vargas confirmed she received her last paycheck.	0.10	16.50
9/18/2024	Steffany Sanguino	Paralegal	Client Moreno confirmed she received her last payment.	0.10	16.50
9/18/2024	Steffany Sanguino	Paralegal	Client Olazabal confirmed she received her last payment.	0.10	16.50
9/19/2024	Brian H. Pollock Esq.	FLSA - Plaintiff	Review and confirm information regarding payments to clients in response to the FMWA demand letters; then, draft exchange emails with defense counsel requesting	0.50	250.00



			breakdown for payments to facilitate our preparation of a demand and clarification regarding information provided in spreadsheet		
9/19/2024	Steffany Sanguino	Paralegal	Spoke with Mr. Quintero regarding his overtime pay to see if we needed to include an overtime claim for him in the case. The client confirmed he was not paid the time and a half.	0.20	33.00
9/19/2024	Steffany Sanguino	Paralegal	I called Maria Hidalgo to discuss the issue of overtime pay	0.10	16.50
9/19/2024	Steffany Sanguino	Paralegal	I called client Elis Moreno to discuss the issue of overtime pay	0.20	33.00
9/19/2024	Steffany Sanguino	Paralegal	I called client Alena Olazabal to confirm if she worked overtime, but no.a. I left a VM.	0.20	33.00
9/19/2024	Steffany Sanguino	Paralegal	I called client Betania Vargas to confirm if she worked overtime. She confirmed she only worked overtime once but was adequately paid for it.	0.20	33.00
9/19/2024	Steffany Sanguino	Paralegal	I called client Kelvid to discuss the issue of overtime pay	0.20	33.00
9/19/2024	Steffany Sanguino	Paralegal	Receipt, review, and analysis of the tip report for Alejandra Parra.	0.20	33.00
9/19/2024	Brian H. Pollock Esq.	Draft/revise	Draft email to Mr. Narula re: payments to certain clients and mooted their FMWA claims, their receipt of payment through Zelle, and the lack of corresponding pay stubs, to obtain information to assist in calculating/providing demand	0.20	100.00
9/20/2024	Steffany Sanguino	Paralegal	I spoke with client Kelvid regarding his overtime and any concerns he had related to it	0.10	16.50
9/20/2024	Steffany Sanguino	Paralegal	I called client Elis Moreno to discuss her overtime hours	0.10	16.50
9/20/2024	Brian H. Pollock Esq.	Draft/revise	Exchange emails with Mr. Narula re: the lack of paystubs, payroll having been run through Zelle and not ADP, and re: the "bonus" column in the spreadsheet to further and better analyze the materials produced after analyzing the materials provided to us	0.40	200.00
9/25/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiffs' Certificate of Interested Parties.	0.30	97.50
9/25/2024	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding filing Plaintiffs' Certificate of Interested Parties.	0.10	32.50
9/25/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50
9/25/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Clerk's Notice to Filer regarding Defendants' Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50
9/26/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' re-filed Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50
9/26/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Clerk's Notice to Filer regarding Defendants' re-filed Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50

9/27/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' second re-filed Certificate of Interested Parties and Corporate Disclosure Statement.	0.10	32.50
9/27/2024	Brooks LaRou Esq.	Draft/revise	Drafted Proposed Scheduling Order.	0.70	227.50
9/27/2024	Brooks LaRou Esq.	Draft/revise	Drafted Joint Scheduling Report.	0.50	162.50
9/27/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review of spreadsheet of payments made to Plaintiffs provided by counsel for Defendants (Anthony Narula); comparison to Plaintiffs' estimates of unpaid wages.	0.20	65.00
9/27/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) sending drafts of Joint Scheduling Report and Proposed Scheduling Order.	0.10	32.50
9/30/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' Answer and Affirmative Defenses.	0.30	97.50
9/30/2024	Brooks LaRou Esq.	Unassigned	Created revised damages spreadsheet to calculate amounts owed to each client after receipt of last paycheck from Cantina Catrina.	0.80	260.00
9/30/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) requesting documents reflecting tip/service charge totals and distribution.	0.10	32.50
9/30/2024	Steffany Sanguino	Paralegal	Conferral with BL regarding outstanding tasks related to service on Juan Carlos.	0.10	16.50
9/30/2024	Brooks LaRou Esq.	Draft/revise	Drafted "Statement of Claim" section of Joint Scheduling Report; calculation of damages in connection with the same.	1.00	325.00
10/1/2024	Brooks LaRou Esq.	Phone Call	Phone call with Alejandra Parra regarding estimation of damages.	0.20	65.00
10/1/2024	Brooks LaRou Esq.	Phone Call	Phone call with client regarding estimation of damages.	0.30	97.50
10/1/2024	Brooks LaRou Esq.	Unassigned	Compiled tip and sale data into Excel spreadsheet in connection with calculating tips and services charges owed to Hernando Quintero and Alejandra Parra.	2.50	812.50
10/2/2024	Brooks LaRou Esq.	Unassigned	Calculation of unpaid tips and service charges; revisions to Statement of Claim section of Joint Scheduling Report.	3.00	975.00
10/2/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) regarding revisions to draft of Joint Scheduling Report.	0.10	32.50
10/2/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Defendants' final revisions to draft of Joint Scheduling Report.	0.20	65.00
10/10/2024	Brooks LaRou Esq.	Unassigned	Final calculation of clients' unpaid wages, tips, service charges, and liquidated damages.	0.80	260.00
10/11/2024	Brooks LaRou	Receipt, Review, and	Receipt and review of Court's Order Setting Trial, Calendar Call, Reference to Magistrate Judge, Pretrial	0.20	65.00

	Esq.	Analysis	Deadlines, and Pretrial Procedures; calendared deadlines in connection with the same.		
10/14/2024	Brian H. Pollock Esq.	Draft/revise	Draft Letter to Client About Trial Setting in Eng and Spa	0.40	200.00
10/14/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino regarding sending letters to clients regarding trial being set, and obtaining settlement authority from clients.	0.10	32.50
10/17/2024	Steffany Sanguino	Paralegal	The client, Quintero, emailed me requesting to call him back. I called the client and provided him with an update. We also talked about the trial order received.	0.40	66.00
10/18/2024	Brooks LaRou Esq.	Phone Call	Phone call with Elis Moreno regarding settlement authority.	0.10	32.50
10/18/2024	Brooks LaRou Esq.	Phone Call	Phone call with Maria Hidalgo regarding settlement authority.	0.10	32.50
10/18/2024	Brooks LaRou Esq.	Unassigned	Conferral with Hillary Frontado regarding setting appointments with remaining clients to discuss settlement authority.	0.10	32.50
10/18/2024	Brooks LaRou Esq.	Phone Call	Phone call with Kelvid Villegas regarding settlement authority.	0.10	32.50
10/18/2024	Brooks LaRou Esq.	Phone Call	Phone call with Hernando Quintero regarding settlement authority.	0.20	65.00
10/18/2024	Brooks LaRou Esq.	Phone Call	Phone call with Alena Olazabal regarding settlement authority.	0.20	65.00
10/18/2024	Brooks LaRou Esq.	Phone Call	Phone call with Alejandra Parra regarding settlement authority.	0.20	65.00
10/21/2024	Brooks LaRou Esq.	Phone Call	Phone call with Betania Vargas regarding settlement authority.	0.20	65.00
10/23/2024	Brooks LaRou Esq.	Email with Client	Email to Hernando Quintero confirming his revised settlement authority.	0.10	32.50
10/23/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiffs' Rule 26 Disclosures; compiled documents for production in connection with the same.	2.00	650.00
10/23/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiffs' opening settlement demand.	0.30	97.50
10/24/2024	Brooks LaRou Esq.	Unassigned	Conferral with Steffany Sanguino regarding serving Plaintiffs' Rule 26 Disclosures, and combining/bates stamping documents for production in connection with the same.	0.10	32.50
10/24/2024	Steffany Sanguino	Paralegal	Organize the documents to be produced with our Rule 26 disclosures	0.60	99.00
10/24/2024	Steffany Sanguino	Paralegal	I combined and created a dropbox link with the expiration and password of our documents disclosed in Rule 26.	0.60	99.00

10/24/2024	Brooks LaRou Esq.	Receipt, Review, and Analysis	Review and revisions to combined/bates stamped documents for production in connection with Plaintiffs' Rule 26 Disclosures.	0.40	130.00
10/24/2024	Steffany Sanguino	Paralegal	Adjustments to the documents produced with Rule 26 have been made. Re-adjusted the batestamp numbers.	0.20	33.00
10/24/2024	Brooks LaRou Esq.	Draft/revise	Final revisions to Plaintiffs' Rule 26 Disclosures.	0.10	32.50
10/24/2024	Steffany Sanguino	Paralegal	Draft email to defense counsel enclosing our Rule 26 Disclosures with documents to be disclosed.	0.20	33.00
10/24/2024	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants conveying opening settlement demand.	0.20	65.00
10/30/2024	Brooks LaRou Esq.	Email with Client	Email to/from client Hernando Quintero regarding status of settlement negotiations.	0.10	32.50
11/6/2024	Brooks LaRou Esq.	Email Communication	Email to/from counsel for Defendants (Anthony Narula) setting conference call to discuss settlement negotiations.	0.10	32.50
11/7/2024	Brooks LaRou Esq.	Unassigned	Preparation for teleconference with counsel for Defendants (Anthony Narula).	0.30	97.50
11/7/2024	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendants (Anthony Narula) regarding assessment of case and damages.	1.10	357.50
12/13/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiffs' First Interrogatories to Cantina Catrina.	1.30	422.50
12/13/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiffs' First Requests for Production to Defendants.	0.50	162.50
12/13/2024	Brooks LaRou Esq.	Draft/revise	Drafted Plaintiff's First Interrogatories to Juan Carlos Cachoua.	0.40	130.00
12/16/2024	Brooks LaRou Esq.	Draft/revise	Final revisions to Plaintiffs' First Requests for Production and Interrogatories to Defendnats; conferral with Steffany Sanguino regarding service of the same.	0.50	162.50
12/16/2024	Steffany Sanguino	Paralegal	Draft email enclosing and propounding our discovery to OC including requests for production and 3 sets of interrogatories.	0.40	66.00
12/16/2024	Brian H. Pollock Esq.	Legal	Perform and document my file audit to determine what has been done on the case, what needs to be done, and provide instructions for case progression and strategy	0.30	150.00
12/27/2024	Steffany Sanguino	Paralegal	I contacted client Maria Hidalgo to obtain additional information and materials from her we believe are necessary for her case	0.20	33.00
12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Maria Hidalgo enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50
12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Ana Mendoza enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50

12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Elias Moreno enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50
12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Alena Olazabal enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50
12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Alejandra Parra enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50
12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Betania Vargas enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50
12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Kelvid Villegas enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50
12/27/2024	Steffany Sanguino	Paralegal	Draft letters in English and Spanish to Hernando Quintero enclosing and regarding the Rule 26 Disclosures and materials disclosed	0.30	49.50
12/27/2024	Steffany Sanguino	Paralegal	Conversation with the client, Quintero, regarding the Rule 26 disclosures. I explained to the client the information enclosed, and informed him this is mandatory in the case. and let him know we are waiting to receive their discovery answers.	0.40	66.00
12/27/2024	Steffany Sanguino	Paralegal	Receipt review of additional information from Ms. Hidalgo	0.10	16.50
1/14/2025	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendants (Anthony Narula) regarding his intent to withdraw from case, Defendants' request for extension to respond to Plaintiffs' discovery requests, and potential for settlement.	0.10	32.50
1/15/2025	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Anthony Narula) confirming 30-day extension of deadline for Defendants to respond to Plaintiffs' discovery requests.	0.10	32.50
1/17/2025	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendants (Anthony Narula) regarding Defendants' settlement counteroffer.	0.30	97.50
2/6/2025	Steffany Sanguino	Paralegal	I called the client, Quintero, to discuss status and our request for settlement authority (to be addressed by the attorney).	0.20	33.00
2/6/2025	Brooks LaRou Esq.	Phone Call	Phone call with Hernando Quintero regarding case status and revised settlement authority.	0.70	227.50
2/13/2025	Brooks LaRou Esq.	Phone Call	Phone call with Alejandra Parra regarding status of settlement negotiations and her revised settlement authority.	0.10	32.50
2/13/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) conveying settlement counteroffer.	0.10	32.50
2/25/2025	Steffany Sanguino	Paralegal	Drafted and sent an email to OC addressing their responses to our request for discovery and requested a timeline for when we can expect the remaining materials and reiterated the importance of receiving these documents to keep the case on track	0.20	33.00



2/27/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) agreeing to additional 30-day extension for Defendants to respond to Plaintiffs' Interrogatories and Requests for Production, and scheduling depositions of Cantina Catrina's corporate representative and Juan Carlos Cachoua.	0.20	65.00
3/5/2025	Brooks LaRou Esq.	Phone Call	Phone call with Defendants' counsel (Anthony Narula) regarding his defenses to Plaintiffs' claims, Quintero's immigration status, and Parra's waiver of claims in connection with her workers' compensation case.	0.20	65.00
3/12/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) regarding Plaintiffs' settlement counteroffer.	0.30	97.50
3/12/2025	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon and provide instructions re: coordinating dates for depositions of Cantina Catrina's corporate representative and Juan Carlos Cachoua, and for mediation.	0.10	32.50
3/13/2025	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendants (Anthony Narula) regarding potential for settlement.	0.30	97.50
3/14/2025	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendant (Emma McCarthy) regarding revisions to Joint Pretrial Stipulation.	0.40	130.00
3/17/2025	Brian H. Pollock Esq.	Draft/revise	Exchange emails with defense counsel to proposed mediator (Dan Feld)	0.20	100.00
3/18/2025	Steffany Sanguino	Paralegal	Receipt and review of the defendant's Responses and Objections to our Requests for Production and Interrogatories and provide initial review of them.	0.30	49.50
3/18/2025	Steffany Sanguino	Paralegal	Receipt, reviewed, and organized Defendants' responsive documents DEF 1 - 23, including a detailed profile page for each of the Plaintiffs for use in determining what is owed.	0.30	49.50
3/24/2025	Brooks LaRou Esq.	Draft/revise	Drafted Joint Motion for Mediation with U.S. Magistrate Judge.	0.40	130.00
3/24/2025	Brooks LaRou Esq.	Draft/revise	Drafted Proposed Order granting Joint Motion for Mediation with U.S. Magistrate Judge.	0.10	32.50
3/24/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants sending drafts of Joint Motion for Mediation with U.S. Magistrate Judge and Proposed Order granting the same, and requesting approval of the same.	0.10	32.50
3/26/2025	Brooks LaRou Esq.	Email Communication	Receipt of email from Defendants' counsel approving drafts of Motion for Mediation with Magistrate Judge and Proposed Order granting the same.	0.10	32.50
3/26/2025	Brooks LaRou Esq.	Unassigned	Conferral with Juan Aragon regarding filing Motion for Mediation with Magistrate Judge and Proposed Order granting the same.	0.10	32.50
3/26/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Order granting Joint Motion for Mediation before Magistrate Judge.	0.10	32.50
3/26/2025	Brooks	Unassigned	Receipt and review of Paperless Order Scheduling	0.10	32.50

	LaRou Esq.		Mediation before Magistrate Judge.		
3/28/2025	Steffany Sanguino	Paralegal	I emailed OC to f.u with their Jurat page for the verified answers.	0.20	33.00
4/1/2025	Steffany Sanguino	Paralegal	I emailed OC to again request their missing verification page(s) for their INTS answers.	0.20	33.00
4/1/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Notice of Appearance by Joanna Niworowski as counsel for Defendants.	0.10	32.50
4/2/2025	Steffany Sanguino	Paralegal	Called Mr. Quintero to discuss the upcoming mediation.	0.20	33.00
4/2/2025	Steffany Sanguino	Paralegal	Call Ms. Parra to discuss the upcoming mediation	0.20	33.00
4/2/2025	Steffany Sanguino	Paralegal	Call Olazabal to discuss the upcoming mediation.	0.20	33.00
4/2/2025	Steffany Sanguino	Paralegal	Called client Vargas to discuss the upcoming mediation.	0.20	33.00
4/2/2025	Steffany Sanguino	Paralegal	I called client Hidalgo to discuss the upcoming mediation	0.20	33.00
4/2/2025	Steffany Sanguino	Paralegal	I called Villegas to discuss the upcoming mediation.	0.20	33.00
4/2/2025	Steffany Sanguino	Paralegal	We received a call from client Quintero to inform us he spoke with everyone on the lawsuit, and everyone is available for the upcoming mediation.	0.20	33.00
4/3/2025	Steffany Sanguino	Paralegal	Receipt of email from OC about their outstanding verification pages advising that we should receive them by the end of the week.	0.10	16.50
4/3/2025	Steffany Sanguino	Paralegal	I called the client to discuss the upcoming settlement conference.	0.20	33.00
4/3/2025	Brooks LaRou Esq.	Phone Call	Phone call with Hernando Quintero in preparation for mediation.	0.50	162.50
4/3/2025	Brooks LaRou Esq.	Phone Call	Phone call with Elis Moreno in preparation for mediation.	0.30	97.50
4/3/2025	Brooks LaRou Esq.	Phone Call	Phone call with Betania Vargas in preparation for mediation.	0.30	97.50
4/3/2025	Brooks LaRou Esq.	Phone Call	Phone call with Alena Olazabal in preparation for mediation.	0.30	97.50
4/4/2025	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendants (Anthony Narula) regarding potential for settlement prior to the settlement conference	0.20	65.00
4/4/2025	Brooks LaRou Esq.	Phone Call	Phone call with Maria Hidalgo in preparation for mediation.	0.30	97.50
4/4/2025	Brooks LaRou Esq.	Phone Call	Phone call with Alejandra Parra in preparation for mediation.	0.40	130.00

4/4/2025	Brooks LaRou Esq.	Phone Call	Phone call with Kelvid Villegas in preparation for mediation.	0.20	65.00
4/4/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) conveying settlement offer for Kelvid Villegas, Maria Hidalgo, Elis Moreno, Alena Olazabal, and Betania Vargas.	0.30	97.50
4/4/2025	Brooks LaRou Esq.	Unassigned	Research regarding effect of filing a consent to join form in FLSA actions, and the opt-in plaintiff's standing to pursue claims asserted by plaintiffs named in the Complaint.	0.30	97.50
4/4/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) sending caselaw regarding opt-in plaintiffs' right to pursue claims asserted by plaintiffs named in the Complaint.	0.10	32.50
4/7/2025	Brooks LaRou Esq.	Phone Call	Follow-up phone call with Hernando Quintero in preparation for mediation to further discuss strategy and what he should expect so we can attempt to resolve his case by managing his expectations	0.80	260.00
4/7/2025	Brooks LaRou Esq.	Phone Call	Phone call with counsel for Defendants (Anthony Narula) regarding potential for settlement.	0.10	32.50
4/7/2025	Brooks LaRou Esq.	Email Communication	Email to counsel for Defendants (Anthony Narula) conveying revised settlement offer for Kelvid Villegas, Maria Hidalgo, Elis Moreno, Alena Olazabal, and Betania Vargas.	0.10	32.50
4/7/2025	Brooks LaRou Esq.	Email Communication	Receipt of email from counsel for Defendants (Anthony Narula) conveying settlement counteroffer.	0.10	32.50
4/7/2025	Brooks LaRou Esq.	Unassigned	Conducted research regarding [REDACTED], entitlement to pursuit liquidated damages under the FLSA for untimely payment of wages required to be paid, and review of damage estimates and clients' settlement authority in preparation for mediation.	3.20	1,040.00
4/7/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Conduct several conferences with Mr. LaRou to discuss strategy for potentially resolving the matter and addressing the Defendants' stubborn reluctance to resolve the fee issue as it relates to the Opt-In Plaintiffs (who will likely have to attend the settlement conference because of the Defendants' refusal to agree that the firm's time spent successfully recovering their money was compensable under the FLSA)	0.60	300.00
4/7/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange multiple emails with Mr. Narulo to clarify that none of the offers included waiving our entitlement to recover attorney's fees from Defendants, especially considering that the Opt-Ins Plaintiffs would be recovering money from Defendants under the FLSA and explaining that Defendants' refusal to agree to pay fees for our representation of the Opt-Ins is THE reason why their claims did not settle before the settlement conference is because of Defendants' stubborn refusal to pay the attorney's fees related to all Plaintiffs (original and Opt-In) who we represented and recovered money through the litigation and Mr. Narulo's misunderstanding of the emails and result of his misunderstanding	0.80	400.00
4/7/2025	Brian H. Pollock	FLSA - Plaintiff	Strategy discussion with Mr. LaRou in preparation for the upcoming settlement conference and to address the	0.90	450.00

	Esq.		anticipated issues raised by Defendants re: prompt payment required by FLSA, Opt-Ins as parties, and liquidated damages issues to counter same		
4/8/2025	Steffany Sanguino	Paralegal	Engage in discussions with Maria Hildago regarding the importance of her attendance at the settlement conference.	0.20	33.00
4/8/2025	Steffany Sanguino	Paralegal	I attended the mediation as a translator to translate between English and Spanish for our clients instead of hiring an outside interpreting service (who charges similar if not higher hourly rates).	4.50	742.50
4/8/2025	Brooks LaRou Esq.	Attendance at	Continued preparation for and attendance at settlement conference where we negotiated a partial resolution of the case but could not resolve the fees	5.10	1,657.50
4/8/2025	Brooks LaRou Esq.	Receipt, Review, and Analysis	Receipt and review of Court's Paperless Minute Order re: Settlement Conference held	0.10	32.50
4/11/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of Paperless Order re: resolution of claims before Judge Torres at settlement conference, requirement to file billing records, and subsequent hearing (and fairness hearing) to be conducted on May 7, 2025	0.10	50.00
4/14/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange emails with defense counsel in response to their email memorializing the terms to address the remaining payment terms not memorialized so we can have the settlement agreement fully drafted, agreed upon, and signed by the end of this week	0.30	150.00
4/14/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Begin drafting the Settlement Agreement to address the settlement of payments to the Plaintiff and Opt-In Plaintiffs, costs to the firm, and the Court determining the fees to the firm	1.10	550.00
4/16/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Initial review of time entries in preparation for filing them with the Court	1.00	500.00
4/17/2025	Brian H. Pollock Esq.	Legal	Call and then (after leaving message for him) draft email to Mr. Narula to address the lack of a response to my email enclosing the draft settlement agreement of April 14, the likely inability of the parties to have a fully signed settlement agreement by tomorrow, and my forthcoming request to extend the deadline to submit time records until 2 days after receipt of a fully signed settlement agreement	0.60	300.00
4/17/2025	Brian H. Pollock Esq.	Draft/revise	Receipt of email with Defendants' proposed revisions to the settlement agreement; then, make additional revisions based on their proposed changes	1.00	500.00
4/18/2025	Brian H. Pollock Esq.	Draft/revise	Draft MET to File our time records based on the agreement from Defendants	0.40	200.00
4/21/2025	Brian H. Pollock Esq.	Draft/revise	Review Resignation, Waiver, and General Release signed by Parra in settling her workers' compensation case and then revise draft of the pending settlement agreement to carve out benefits, vested benefits, and fees/costs related to her Jan. 20, 2024 w/c claim	0.60	300.00
4/21/2025	Brian H. Pollock Esq.	Draft/revise	Draft email to defense counsel enclosing the W-9s for my firm and everyone but Ms. Parra, the W-4 for Mr. Quintero, and the revised draft of the settlement agreement explaining same and the forthcoming materials from Ms.	0.20	100.00

			Parra		
4/21/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Paperless Order Granting our MET (to file our time records)	0.10	50.00
4/24/2025	Brian H. Pollock Esq.	Draft/revise	Draft email to Ms. Niworowski after not hearing from her in response to my April 21 email which enclosed my proposed revisions to the settlement agreement and requesting her advise me of any further proposed changes so we can wrap up the settlement agreement and get it executed by our clients	0.20	100.00
4/25/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt of email from Mr. Narula enclosing the further revisions to the settlement agreement and analyze same against the email Ms. Niworowski sent on April 8, 2025, memorializing the terms agreed to at the settlement conference; then, further revise the settlement agreement to conform same to the agreements reached and make specific provision to account for permitted disclosures and survival of the agreements executed in connection with Ms. Parra's settlement of her workers' compensation case	0.80	400.00
4/28/2025	Brian H. Pollock Esq.	Draft/revise	Draft f/u email to defense counsel to inquire about the status of their review of the updated version of the settlement agreement (since the approval and fee hearing is next week)	0.20	100.00
4/29/2025	Brian H. Pollock Esq.	Draft/revise	Draft another email to Mr. Narula since I still had not heard back from him after sending the latest version of the settlement agreement on Friday, April 25, and expressing my concern about the upcoming hearing (since I'd like to give Judge Becerra time to review the time records before the May 8 hearing) and advising of my limited schedule this week to review any further revisions	0.20	100.00
4/30/2025	Brian H. Pollock Esq.	Draft/revise	Receive Mr. Narula's email with further revisions to the proposed settlement agreement, pushing back on the division of wages/liquidated damages for Quintero and Parra, and further revising other language; review the proposed revisions and then make further revisions to limit the tax indemnification language and make other changes on one version of the agreement and to then remove the tax indemnification language and the division of the settlement for Quintero and Parra based on the extent of the agreement at the settlement conference and draft responsive email to him explaining reasons why changes proposed by his office has resulted in the expenditure of so much more time, responding to the points he raised, and providing an option for his client to accept either version of the proposed agreement (one with the division between wages/liquidated damages for Quintero and Parra with tax indemnification language and one without the division or tax indemnification language)	1.10	550.00
4/30/2025	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of email from Mr. Narula with his proposed revisions to the settlement agreement (which re-inserted the previously deleted language providing for tax indemnification for Defendant's actions) and then speak with him at length to try to resolve the pending issue, but to no avail.	0.80	400.00
4/30/2025	Brian H. Pollock Esq.	Draft/revise	Draft email to Mr. Narula in response to his to memorialize several points we discussed, to address his comments about his experience with tax indemnification in wage cases, conduct research on Pacer re: his experience in	0.60	300.00



			FLSA cases (23 cases in S.D. Fla. including 2 FLSA cases - including this one), and the unfortunate need to now raise this issue with the Court - which would be a first for me		
5/1/2025	Brian H. Pollock Esq.	Draft/revise	Further revise proposed settlement agreement and draft email to Mr. Narula enclosing same as a last-ditch effort at resolving the language at issue	0.40	200.00
5/1/2025	Brian H. Pollock Esq.	Draft/revise	Exchange email with defense counsel re: our agreement to his proposal to conduct a settlement conference with the Magistrate Judge in lieu and/or prior to mediation	0.20	100.00
5/1/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Final review of time records; redact as necessary	0.50	250.00
5/7/2025	Brian H. Pollock Esq.	Attendance at	(Estimated time for) Preparation for and attendance at upcoming hearing re: approval of settlement and determination of attorney's fees to be awarded for representation in this case	4.00	2,000.00

**Services Subtotal:37,321.35**

**Total:37,321.35**

**Brian H. Pollock, Esq. \$500/hour**

**Patrick Brooks LaRou, Esq. \$325/hour**

**Steffany Sanguino (Paralegal) \$165/hour**